

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF GEORGIA
ATLANTA DIVISION**

**IN RE: SUBPOENA ISSUED TO
NON-PARTY INNOVATION LAW
LAB**

IN THE MATTER OF:

The State of Arizona,
By and Through its Attorney General,
Mark Brnovich, et al.,

Plaintiffs,
v.

Merrick Garland, in his official
capacity as Attorney General of the
United States, et al.,

Defendants.

Case No.: _____

United States District Court
Western District of Louisiana
LaFayette Division
Civil Action No. 6:22-cv-01130-DCJ-CBW

**DECLARATION OF NANCY CRUZ IN SUPPORT OF INNOVATION
LAW LAB'S MOTION TO QUASH THIRD-PARTY
RULE 45 SUBPOENA**

I, Nancy Cruz, declare as follows:

1. I have personal knowledge of the facts stated herein and, if called upon to do so, could and would testify competently thereto. I state that the following is true and correct to the best of my knowledge and belief.

2. I am employed as an attorney with Perkins Coie LLP. I represent Innovation Law Lab (“Law Lab”) in the above-captioned action.

3. Attached hereto as Exhibit A is a true and correct copy of the Subpoena to Produce Documents, Information, or Objects or to Permit Inspection of Premises in a Civil Action, dated February 17, 2023 (“Subpoena”).

4. Attached hereto as Exhibit B is a true and correct copy of the Second Amended Complaint filed on November 10, 2022, with the United States District Court for the Western District of Louisiana Lafayette Division, in Civil Action No. 6:22-cv-01130-DCJ-CBW.

5. Attached hereto as Exhibit C is a true and correct copy of the Status Report submitted on December 2, 2022, by the parties to the United States District Court for the Western District of Louisiana Lafayette Division, in Civil Action No. 6:22-cv-01130-DCJ-CBW.

6. Attached hereto as Exhibit D is a true and correct copy of the Minutes of Court for a Status Conference held on December 16, 2022, by the United States District Court for the Western District of Louisiana Lafayette Division, in Civil Action No. 6:22-cv-01130-DCJ-CBW.

7. Attached hereto as Exhibit E is a true and correct copy of the Minutes of Court for a Status Conference held on January 17, 2023, by the United States

District Court for the Western District of Louisiana Lafayette Division, in Civil Action No. 6:22-cv-01130-DCJ-CBW.

8. Attached hereto as Exhibit F is a true and correct copy of e-mail correspondence between Perkins Coie LLP partner, Emily Greb, and Deputy Solicitor General, Joseph Scott St. John, or the State of Louisiana's Office of Attorney General, by which attorneys conferred regarding service of and compliance with the Subpoena attached as Exhibit A to this declaration.

Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury, under the laws of the United States, that the foregoing is true and correct to the best of my knowledge.

Executed on March 16, 2023

By: /s/ Nancy Cruz
Nancy Cruz

CERTIFICATE OF SERVICE

I hereby certify that on March 16, 2023, I electronically filed the within and foregoing **DECLARATION OF NANCY CRUZ IN SUPPORT OF INNOVATION LAW LAB'S MOTION TO QUASH THIRD-PARTY RULE 45 SUBPOENA**, with the Clerk of Court using the CM/ECF system, which will automatically send email documentation of such filing to all attorneys of record.

I further certify that on this day, I served a true and correct copy of the within and foregoing upon counsel of record in the underlying action by electronic email and by depositing a true and correct copy of same in the United States Mail, first-class postage prepaid, addressed as follows:

JEFF LANDRY
LOUISIANA ATTORNEY GENERAL
Joseph S. St. John
Deputy Solicitor General
Office of the Attorney General
Louisiana Department of Justice
1885 N. Third Street
Baton Rouge, LA 70804
STJohnj@ag.louisiana.gov

*Counsel for State of Louisiana
A Plaintiff in the Underlying Action*

Brian Ward
U S Department of Justice
P.O. Box 868 Ben Franklin Station
Washington, D.C. 20044
Brian.c.ward@usdoj.gov

Erez R. Reuveni
U S Department of Justice
Civil Division (5th)
450 5th Street NW
Washington, D.C. 20001
Erez.r.reuveni@usdoj.gov

*Counsel for Defendants
In the Underlying Action*

Dated: March 16, 2023

**KILPATRICK TOWNSEND &
STOCKTON LLP**
1100 Peachtree Street, Suite 2800
Atlanta, Georgia 30309-4530
(404) 815-6500
Fax: (404) 815-6555
TCaldas@kilpatricktownsend.com
GReddy@kilpatricktownsend.com
BTRichardson@kilpatricktownsend.com

/s/ Bennett T. Richardson
Gautam Reddy
Georgia Bar No. 757546
Tamara Serwer Caldas
Georgia Bar No. 617053
Bennett T. Richardson
Georgia Bar No. 974586

Attorneys for Innovation Law Lab